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April 24, 2014

**VIA CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Keith Olinger, SFD-7-5  
United States Environmental Protection Agency  
Region IX  
Superfund Division  
75 Hawthorne Street  
San Francisco, California 94105

**Re: Real Property Located at 10643 Norwalk Boulevard  
Santa Fe Springs, CA ("Property")  
104(e) Information Request Responses**

Dear Mr. Olinger:

Mr. James C. Stull is in receipt of Ms. Kathi Moore's April 10, 2014 letter from the United States Environmental Protection Agency ("EPA"). As an initial matter, Continental Development Company, L.P. ("CDC") was dissolved on December 31, 2013 and it no longer exists. Please see the attached "Limited Partnership Certificate of Cancellation" that was filed with the Secretary of State on December 31, 2013 regarding the CDC dissolution/cancellation. (This document is included on the enclosed CD marked as "CDC's Information Request Responses Attachments.") However, in this letter reference is made to CDC even though it is a dissolved/cancelled entity.

The responses set forth herein and any subsequent correspondence do not constitute a waiver of any defense, right or objection that CDC (or any affiliate thereof) has, may have or may acquire as to the EPA's information request. CDC specifically reserves any and all rights, privileges and opportunities it has, may have or may acquire under federal, state or local law, regulation or ordinance, including the right to challenge or object to this EPA information request as being overly broad and not sufficiently limited in scope, readily available through alternative sources, or in excess of statutory authority. The responses provided herein are being submitted without admission of any liability with respect to the Property. All information provided herein is to the current knowledge, information and belief of CDC.

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**Question 1:**

*State the full legal name, address, telephone number, position(s) held by, and tenure of, the individual(s) answering any of these questions on behalf of Continental Development Company, L.P. ("CDC") concerning the matters set forth herein.*

**Response 1:**

James C. Stull, President  
Continental Heat Treating, Inc.  
10643 South Norwalk Boulevard  
Santa Fe Springs, California 90670  
(562) 944-8808

Continental Heat Treating, Inc. ("CHT") was the general partner of CDC. Mr. James C. Stull has been the President of CHT since June 22, 2001. Mr. James C. Stull's now deceased father, Mr. James G. Stull, ran CHT from 1969 until 2004.

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**Question 2:**

*Please provide a written response reporting the status, during the period of your ownership of the Property, of all cleanup or other activities that have or are taking place at the Property under the direction of federal, state or local authorities. The response should include a copy of all agreements between you and another party or parties, or orders from federal, statute or local authorities, related to the Property.*

**Response 2:**

During CDC's period of ownership of the Property, the State of California Regional Water Quality Control Board ("RWQCB") directed/ordered CHT to perform certain vapor intrusion, soil gas, soil matrix and groundwater investigation and monitoring work ("Work") at and about the Property. CHT has performed and reported such work as directed/ordered by the RWQCB. CHT continues to perform such Work in accordance with the RWQCB direction/order. CHT also provides EPA's contractor, CH2MHill, with copies of its semi-annual groundwater monitor results. There is no order, agreement or any other document between CDC and a regulatory agency in connection with such Work or the Property.

The RWQCB directives/orders issued to CHT in connection with the Property, CHT's workplans, and CHT's investigation and monitoring results can generally be obtained and/or viewed at the following State of California State Water Resources Control Board Geotracker ("Geotracker") site: [geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=SLT43690688](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=SLT43690688).

In addition, between March 2, 2004 and September 21, 2004, CHT operated a soil vapor extraction system ("VES") around the location of the former solvent degreaser. This system operated continuously, except for carbon change outs, during this period. The operation of the VES was terminated due to interferences caused to the system by petroleum hydrocarbon soil vapors that migrated from the former ExxonMobil "Jalk Fee" property. Such property is adjacent to the Property to the north.

**Question 3:**

*Provide a description of all environmental impacts during your ownership of the Property and the condition of the Property at the time of your sale of it. Include all reports with details regarding soil, groundwater, soil vapor and air sampling during your period of ownership.*

**Response 3:**

There were no environmental impacts to the Property during CDC's period of ownership. All impacts associated with the Property pre-date CDC's ownership of the Property.

The environmental condition of the Property at the end of CDC's ownership of the Property is best described in the February 12, 2014 "Second Semi-Annual Groundwater Well Monitoring Report 2013." This groundwater monitor event was performed at the Property on October 10, 2013 by Fero Engineering on behalf of CHT. This report can be accessed via Geotracker at:

[geotracker.waterboards.ca.gov/es/uploads/geo\\_report/9678178906/SLT43690688.pdf](http://geotracker.waterboards.ca.gov/es/uploads/geo_report/9678178906/SLT43690688.pdf)

Many of the reports associated with the soil, groundwater, soil vapor and air sampling performed at the Property on behalf of CHT during CDC's period of ownership can be accessed on the above provided Geotracker site. However, the attached CD contains copies of all of the reports associated with the soil, groundwater, soil vapor and air vapor sampling performed at the Property on behalf of CHT during CDC's period of ownership including the February 12, 2014 report referenced above. Also contained on such CD are copies of the May and December, 2004 VES progress reports.

**Question 4:**

*CDC's January 24, 2014 letter to EPA stated that at the time CDC acquired the Property, it met the criteria to qualify as a bona fide prospective purchaser ("BFPP"), and that CDC had performed "all appropriate inquiry" into the previous ownership and uses of the Property before it acquired the Property. However, CDC did not provide any requested supporting documentation for these claims. Please provide all documents evidencing CDC's "all appropriate inquiry" into the previous ownership and uses of the Property before CDC's acquisition of the Property.*

**Response 4:**

Please see the attached CD for a copy of the March 1, 2002 CENTEC Engineering "Phase II Site Investigation Report" ("CENTEC Report"). In addition, please see the attached CD for a copy of the compendium of documents that were compiled in connection with and prior to CDC's acquisition of the Property. These documents comprise CDC's "all appropriate inquiry" documentation that is currently available to CDC.

**Question 5:**

*CDC also stated that the current owner of the Property is Continental Heat Treating, Inc. ("CHT"). Please provide a copy of the grant deed(s) transferring the Property from CDC to CHT. If CDC transferred the Property to a person or entity other than CHT, please provide a copy of the grant deed(s) evidencing such transfer.*

**Response 5:**

Please see the attached CD for a copy of the grant deed transferring the Property from CDC to CHT.

**Question 6:**

*In its January 24, 2014 letter, CDC also stated that the use of VOCs was terminated before CDC acquired the Property. Please provide any and all documents in your possession that demonstrates that the use of VOCs was terminated.*

**Response 6:**

EPA is referred to page 1 of the CENTEC report which states, among other things, that "CHT housed a solvent degreaser in the center of the building from 1986 to 1995" and that such solvent degreaser is "no longer used." This was the former perchloroethylene ("PCE") solvent degreaser.

In addition, see the attached CD for a copy of the CHT "Perch Haz. Manifests Recap" and the associated CHT manifests which show CHT's use of PCE on the Property did not include CDC's period of ownership.

Further, see the attached CD for a copy of the 1995 and 1996 CHT annual emission reports that were submitted to the South Coast Air Quality Management District. You will note that there were PCE emissions in 1995 and no PCE emissions in 1996 since the PCE use at the CHT facility ended in 1995.

Also, see the attached CD for a copy of the CHT July 14, 1997 letter and its attachments to the California Department of Toxic Substances Control in connection with the "Nonemergency Hazardous Substances Release Report." In such document, it is stated that the vapor degreaser equipment was removed from the Property in 1995. In addition, it is stated that the degreaser and solvents that had been used in the degreaser have been removed from the facility to prevent any additional releases.

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With respect to other VOCs such as trichloroethylene ("TCE"), 1,1,1-trichloroethane ("TCA"), or other chlorinated solvents such as Freons 11 and 113, CHT advises that it does not recall the use of such VOCs at any time. That is, CHT only recalls the historical use of PCE and such use pre-dated CDC's ownership of the Property.

If you have any questions regarding the responses provided herein please contact the undersigned.

Very truly yours,



Michael A. Francis

MAF/blt

Enclosure

cc: Mr. James Stull (w/enc.) (Via E-mail)  
Mr. Robert Schneider (w/o enc.) (Via E-mail)  
Julian A. Pollok, Esq. (w/o enc.) (Via E-mail)  
Ralph Cassady, Esq. (w/o enc.) (Via U.S. Mail)